

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL, INC., et al.	§	
	§	
	§	
Plaintiffs	§	
	§	
v.	§	C A. No. 04-1338 (KAJ)
	§	
	§	JURY TRIAL DEMANDED
APPLE COMPUTER, INC., et al.	§	
	§	
Defendants.	§	

DECLARATION OF TETSUYUKI WATANABE

Tetsuyuki Watanabe hereby declares under penalty of perjury that the following is true and correct:

1. I am Director of Licensing Center of IPR Operations Company of Matsushita Electric Industrial Co., Ltd. ("MEI"), and have been the Director of Licensing Center of IPR Operations Company of MEI since April 1, 2003. I am the senior legal representative at MEI and in this capacity, I manage and oversee licensing and intellectual property-related litigations for MEI. As such, I am fully familiar with the facts set forth herein. I respectfully submit this Declaration in connection with defendants Matsushita Electric Industrial Co., Ltd. and Panasonic Corporation of North America (*fka* Matsushita Electric Corporation of America) (collectively, "Matsushita") request that Matsushita be stayed in accordance with the Court's October 7, 2005 Order.

2. Based on internal investigations conducted by MEI employees who are under my supervision, Matsushita does not presently manufacture, and, to its knowledge, has never manufactured in the past, the EDTCA32QSF LCD module. Rather, this module has been manufactured only by Toshiba Matsushita Display Technology Co., Ltd. ("TMD"), which took over MEI's LCD manufacturing division in April 2002.


3. Subsequent to the TMD transaction, MEI for a time acted as a sales agent for TMD in connection with sales of LCD modules overseas, including the EDTCA32QSF module, pursuant to a sales agency agreement between TMD and MEI.

4. With respect to the EDMGRB6KAF LCD module, based on MEI's internal investigations, and to its knowledge, MEI's former LCD manufacturing division ceased the manufacture and sale of this module in May 2001. MEI discontinued this module at that time, and it is now obsolete.

5. Based on its investigation, Matsushita also determined that, to its knowledge, it never made, offered for sale, sold, imported, or used the EDMGRB6KAF module in the United States. Matsushita sold this module only overseas, in Japan, Korea, and Taiwan.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: May 18, 2006 in Osaka, Japan


Tetsuyuki Watanabe

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 18, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following, and the document is available for viewing and downloading from CM/ECF, and the document has also been served as indicated:

BY FIRST CLASS MAIL

Thomas C. Grimm, Esquire
Leslie A. Polizoti, Esquire
Morris, Nichols, Arsht & Tunnell
Chase Manhattan Centre
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
tgrimm@mnat.com
lpolizoti@mnat.com

Thomas L. Halkowski, Esquire
Fish & Richardson, P.C.
919 N. Market Street, Suite 1100
P.O. Box 1114
Wilmington, DE 19899-1114
halkowski@fr.com

Richard L. Horwitz, Esquire
Potter Anderson & Corroon
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
rhorowitz@potteranderson.com

Adam Wyatt Poff, Esquire
Young, Conaway, Stargatt & Taylor
17th Floor, The Brandywine Building
1000 West Street
P.O. Box 391
Wilmington, DE 19899
apoff@ycst.com

Francis DiGiovanni, Esquire
Connolly, Bove, Lodge & Hutz LLP
The Nemours Building
1007 North Orange Street
P.O. Box 2207
Wilmington, DE 19899
fdigiovanni@cblh.com

Arthur G. Connolly, III, Esquire
Connolly Bove Lodge & Hutz
8th Floor, The Nemours Building
1007 N. Orange Street
P.O. Box 2207
Wilmington, DE 19899
aconnollyIII@cblh.com

David E. Moore, Esquire
Potter Anderson & Corroon
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
dmoore@potteranderson.com

Amy Evans, Esquire
Cross & Simons, LLC
Suite 1001, 913 N. Market Street
P.O. Box 1380
Wilmington, DE 19899
aevans@crosslaw.com

Frederick L. Cottrell, III, Esquire
Richards, Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19899
cottrell@rlf.com

Robert J. Katzenstein, Esquire
Smith, Katzenstein & Furlow LLP
800 Delaware Avenue, 7th Floor
P.O. Box 410
Wilmington, DE 19899
rkattenstein@skdelaware.com

Philip A. Rovner, Esquire
Potter Anderson & Corroon
6th Floor, Hercules Plaza
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899
provner@potteranderson.com


David J. Margules, Esquire
Bouchard, Margules, Friedlander
222 Delaware Avenue, Suite 1400
Wilmington, DE 19801
dmargules@BMF-law.com

John W. Shaw, Esquire
Young, Conaway, Stargatt & Taylor
17th Floor, The Brandywine Building
1000 West Street
P.O. Box 391
Wilmington, DE 19899
jshaw@ycst.com

Karen L. Pascale, Esquire
Young, Conaway, Stargatt & Taylor
17th Floor, The Brandywine Building
1000 West Street
Wilmington, DE 19899
kpascale@ycst.com

William J. Marsden, Jr., Esquire
Fish & Richardson, P.C.
919 N. Market Street, Suite 1100
P.O. Box 1114
Wilmington, DE 19899
marsden@fr.com

Monte Terrell Squire, Esquire
Young, Conaway, Stargatt & Taylor
17th Floor, The Brandywine Building
1000 West Street
P.O. Box 391
Wilmington, DE 19899
msquire@ycst.com


William J. Wade (#704)

Dated: May 18, 2006